

SCOTT KEITH WILSON, Federal Public Defender (#7347)
TESSA M. HANSEN, Assistant Federal Public Defender (#14671)
OFFICE OF THE FEDERAL PUBLIC DEFENDER
DISTRICT OF UTAH
Attorneys for Defendant
46 West Broadway, Suite 110
Salt Lake City, Utah 84101
Telephone: (801) 524-4010
Email: tessa_hansen@fd.org

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,
Plaintiff,
v.
WICLIFF YVES FLEURIZARD,
Defendant.

**STIPULATED MOTION TO
CONTINUE JURY TRIAL**

Case No.: 2:24-00133

District Judge David Barlow

Defendant, Wicliff Yves Fleurizard, by and through the undersigned counsel, moves to continue the trial date set for November 8, 2024.

A Complaint was filed on March 18, 2024. Defendant first appeared before a judicial officer of the court for an Initial Appearance on March 21, 2024. The Grand Jury returned an Indictment on April 17, 2024. Undersigned counsel filed a motion waiving Mr. Fleurizard's appearance at the Arraignment and this Court granted the motion. A 4-day Jury Trial was set for August 9, 2024, which was within the 70-day time period of the Speedy Trial Act. This is the defendant's second request for a continuance.

Defendant seeks a continuance under 18 U.S.C. §3161(h)(7)(B)(iv). Defendant alleges that the continuance is necessary because not granting the continuance would deny counsel for the defendant the reasonable time necessary for effective preparation, taking into account due diligence.

The following factual assertions support defendant's request: This case involves a defendant who is currently residing in Texas, and voluminous discovery that includes material from cell phone extractions, surveillance videos and airline records. The government has recently provided additional discovery. This discovery is voluminous and will require additional time to review and investigate.

The defendant has been notified of the requested continuance. YES NO

Opposing counsel agrees with the requested continuance. YES NO

Defendant requests a continuance of 90 days. Because the proposed 90-day continuance will allow defense counsel time to review discovery, fully investigate this case and coordinate with Mr. Fleurizard, the ends of justice are best served by a continuance of the trial date, and the ends of justice outweigh the interest of the public and Mr. Fleurizard in a speedy trial.

DATED this 4th day of October, 2024.

/s/ Tessa M. Hansen
TESSA M. HANSEN
Assistant Federal Public Defender